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Hon. Chief Judge Colleen McMahon United States District Court Southern District of New York Daniel Patrick Moynihan US Courthouse 500 Pearl Street, New York, New York 10007-1312

Re: Wallace Church & Co., Inc. et. al. v. WyattZier, LLC et. al.

Case No.: 1:20-cv-01914-CM

Dear Chief Judge McMahon:

This firm represents Plaintiffs Wallace Church & Co., Inc. and Stan Church in the above-referenced action. Plaintiffs submit this letter motion in accordance with your Individual Practice and Procedures for the purpose of respectfully requesting an extension of time to file an Opposition to Plaintiff's Motion for Judgment on the Pleadings from January 4, 2021 to February 4, 2021.

This request is the first request for a motion response extension in connection with the Motion for Judgment on the Pleadings. I am requesting an extension of time in order to ensure adequate time to review the salient facts and to confer with the client prior to responding to the Motion.

Defendants' Counsel has consented to the extension.

Counsel for Plaintiffs would be pleased to answer any questions you may have regarding this request.

Respectfully submitted,

Anna Karin F. Manalaysay